

**Imperial Sand Dunes  
Recreation Area Management Plan  
Scoping Report**



September, 2008

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## **1.0 Introduction**

This scoping report documents the public scoping process of the Bureau of Land Management (BLM) as it initiates the resource management planning and National Environmental Policy Act (NEPA) process for the Imperial Sand Dunes Recreation Area (ISDRA). The BLM will publish a recreation area management plan (RAMP) and supporting environmental impact statement (EIS) as the final products of the planning and environmental analysis process.

The ISDRA project area encompasses approximately 150,000 acres of public lands located in extreme Southeastern California, near the Arizona and U.S. Mexico border in Imperial County, bounded to the west by the Old Coachella Canal, to the east by the Union Pacific Railroad, to the North by Mammoth Wash, and to the south by Interstate 8 and the California/Mexico border.

The primary activities in the ISDRA include off-highway vehicle use and camping. The Imperial Sand Dunes consist of a typical sand dune habitat with the larger dunes found in the central portion of the planning area. Microphyll woodlands can be found on the eastern edge of the sand dunes and are comprised of several species, including palo verde, mesquite and ironwood.

### A. Purpose and Need for the ISDRA RAMP

The purpose of this planning effort is to revise the ISDRA RAMP for the comprehensive assessment, evaluation and updating of current land use decisions on BLM administered lands in the ISDRA. Since the development of the previous RAMP, many political, social and environmental changes have occurred that affect resource conditions and influence public land uses.

Land use planning is critical to ensuring a coordinated and consistent approach to managing public lands. The resource management planning process is a key tool used by BLM, in collaboration with interested publics, to manage the resources and uses on public lands managed by the BLM. Recreation area management plan decisions establish goals and objectives for resource management (i.e., desired future conditions), the measures needed to achieve these goals and objectives, and parameters for uses on BLM lands. Subsequent to the recreation management plan, implementation-level decisions are made on site-specific actions that implement the RAMP (i.e., right-of-way grants, vegetation treatments, etc.). RAMP decisions ordinarily are made on a broad scale and guide site-specific implementation decisions.

The ISDRA RAMP was updated in 2003 to establish goals, objectives and management actions for BLM public lands that addressed current issues, knowledge and conditions. However, a 2006 Federal court order remanded the previous 2003 ISDRA RAMP to BLM for further consideration. The 2006 court order also vacated and remanded the previous U.S. Fish and Wildlife Service (FWS) critical habitat designation for the federally threatened Peirson's milk-vetch (PMV). On February 14, 2008, the FWS

published a final rule revising critical habitat for PMV. Shortly thereafter, BLM began work on a new RAMP, to address the new critical habitat designation.

Several key issues were identified during the scoping process that will be addressed in the new RAMP and will help drive the development of alternatives. These issues included:

- Identification of areas open and closed to motorized OHV recreation,
- Identification of other allowable uses within the planning area,
- Resource protection (microphyll woodland communities, plants, wildlife, cultural resources).

A handful of other issues were also identified during the scoping process that will be considered during the planning process, including:

- Facilities management,
- Law enforcement/Public health and safety,
- Fee program management,
- Possibility of concessions
- Visitor capacity
- Solid waste/hazardous materials management

In addition, many new studies and sources of information have been generated since the last RAMP was written which will be used to help develop alternatives and analyze impacts.

## B. Description of Resource Conditions

### *Visitor Use and Recreation*

The ISDRA has been a world-class destination for off-highway vehicle recreation for many years. Over the past few years, visitation to the ISDRA has dramatically increased as a result of the rapid growth in high performance off-road vehicles and the increase in large population centers including San Diego, Phoenix and Los Angeles, which are all within easy traveling distance from the ISDRA. With Southern California's continued population growth, shifting demographic patterns have increased the demand for outdoor recreation in the ISDRA.

### *Recreation Visitor Services*

Visitor facilities in the ISDRA include the Cahuilla Ranger Station and several campgrounds: Gecko, Glamis, Cement Flats, Keyhole, Roadrunner, Garbage Flats, Wash 10, Wash 20, Dunebuggy Flats, Midway, Gray's Well, Buttercup, Ogilby and Mammoth Wash. Vault toilets and trash receptacles are located at or near each of these campgrounds. Informational kiosks are present at Dunebuggy Flats, Wash Road, Glamis Flats, Gecko and Gray's Well campgrounds.

In addition to the above amenities, BLM provides emergency medical services during the high use season (October through May) on all holiday weekends (24 hours) and non-holiday weekends (7am-7pm).

*Non-motorized Recreation Opportunities*

Non-motorized ISDRA visitor use includes hiking, backpacking, camping, photography and sightseeing.

Hiking, camping and backpacking typically occur during the winter with a few hardy souls traversing the dunes in the heat of the summer. Visitors are drawn to the ISDRA to explore the unique ecosystem and explore the shifting terrain. Sightseers can often glimpse the ISDRA from the two highways that traverse it in an east/west direction: Highway 78 (northern section of ISDRA) and Interstate 8 (southern section of ISDRA). These highways make the ISDRA quite accessible to both OHV users and non-OHV users alike.

*Vegetation*

The ISDRA is home to one federally threatened plant, the Peirson’s milk-vetch (*Astragalus magdalenae* var. *peirsonii*) and several state-listed and BLM sensitive plants. These plant species are either locally rare populations or are only known to exist in the ISDRA. Special status plant species of management concern that occur or have potential to occur in the ISDRA are listed below:

<b>Common Name</b>	<b>Scientific Name</b>	<b>Status</b>
Peirson’s milk-vetch	<i>Astragalus magdalenae</i> var. <i>peirsonii</i>	Federally Threatened
Wiggin’s Croton	<i>Croton wigginsii</i>	State Rare, CNPS2
Algodones Dunes Sunflower	<i>Helianthus niveus</i> spp. <i>tephrodes</i>	State Endangered, CNPS1B
Giant Spanish Needle	<i>Palafoxia arida</i> var. <i>gigantea</i>	BLM sensitive, CNPS1B

CNPS = California Native Plant Society

The primary habitat types associated with the dune system are: creosote bush scrub, psammophytic scrub, active dune, microphyll woodland, Sonoran desert scrub, and canal influenced vegetation.

Creosote bush scrub generally occurs on the edges of the dune system and occasionally in the central portion. Creosote bush scrub is the most common vegetation community in the Colorado Desert and typically occurs in well-drained secondary soils of slopes, fans, and valleys. Characteristic species for this community include creosote bush, brittlebush, and burrobrush. The creosote bush habitat in the ISDRA generally consists of widely spaced shrubs, usually interspersed with bare ground. The western flank consists of almost pure stands of creosote bush.

Psammophytic ("sand loving") scrub occurs in the interior portion of the sand dune system, both in the active sand dunes and partially stabilized areas. This type of vegetation occurs most frequently between active dunes in areas that form depressions. As the dunes shift from year to year, the depressions generally shift as well. The vegetation in this area is adapted to relatively high sand mobility, deep water percolation and is capable of rapid growth.

Sonoran Desert Scrub occurs on the extreme eastern edge in the planning area as a transition zone between creosote bush scrub and microphyll woodland. This habitat includes desert dry wash woodland, as well as alluvial fans that support ocotillo, brittlebush, and cacti.

The area on the eastern side of the dune system is a large alluvial fan draining the Chocolate and Cargo Muchacho Mountains. The alluvial fan is dissected into numerous washes and plains. The microphyll woodland habitat is found along these dry-wash channels and around the cul-de-sac sinks at the end of the washes. Trees associated with this habitat are palo verde, ironwood, smoke tree, and, to a lesser degree, honey mesquite and desert willow. Microphyll woodland habitat supports the highest diversity of wildlife in the ISDRA.

The Coachella Canal and the All-American Canal support some non-native, water dependent vegetation, which is periodically eradicated.

### *Wildlife*

The planning area provides habitat for an abundance of hardy wildlife species, including numerous birds, mammals, reptiles and invertebrates. The ISDRA is within the range of several special status wildlife species, including the Desert Tortoise (federally listed threatened), the Flat-tailed Horned Lizard (BLM Species of Management concern) and the LeConte's Thrasher (BLM sensitive species). Wildlife species of management concern (including special status species) that occur in the planning area are described in the table below. Future site assessments, monitoring or confirmed sightings/specimens recovered from the ISDRA will establish a known occurrence for species that may occur in the ISDRA. These new occurrences will become a factor considered in future planning for the ISDRA.

<b>Common Name</b>	<b>Scientific Name</b>	<b>Status</b>
Couch's Spadefoot Toad	<i>Scaphiopus couchi</i>	BLM Sensitive
LeConte's Thrasher	<i>Toxostoma lecontei</i>	BLM Sensitive
Burrowing Owl	<i>Athene cunicularia</i>	BLM Sensitive
Flat-tailed Horned Lizard	<i>Phrynosoma mcalli</i>	BLM Sensitive
Colorado Desert Fringe-toed Lizard	<i>Uma notata</i> spp. <i>notata</i>	BLM Sensitive
Desert Tortoise	<i>Gopherus agassizi</i>	Federally threatened

### *Cultural Resources*

Cultural resources in the management area represent both prehistoric and historic eras. The planning area includes about 150,000 acres. Known prehistoric sites are dominated by ceramic scatters and lithic scatters, but trails, rock enclosures, and temporary camps have been reported. Key historic resources include remnants of the Plank Road, All American Canal, and Coachella Canal, all of which are National Register of Historic Places eligible properties.

Other recorded historic era resources include railroad construction camps and communities like Ogilby, Glamis, and Acolita; camps related to construction of water systems; and camps and activity areas related to the World War II Desert Training Center.

About 5% of the total 150,000 acres was surveyed for the 2003 RAMP effort.

### *Visual Resources*

The BLM has not formally inventoried the lands within the ISDRA, nor has it given those lands relative visual ratings (Management Classifications) as outlined in BLM's Visual Resources Management Manual 8400 and its Visual Resource Inventory Manual H-8410-1. A visual resources inventory and subsequent visual resources management (VRM) classification of the planning area lands will occur as part of the ISDRA RAMP planning process.

The four potential VRM Classes are described below:

1. Class I. The objective of this class is to preserve the existing character of the landscape. This class provides for natural ecological changes; however, it does not preclude very limited management activity. The level of change to the characteristic landscape should be very low and must not attract attention.
2. Class II. The objective of this class is to retain the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.
3. Class III. The objective of this class is to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate. Management activities may attract attention but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape.

4. Class IV. The objective of this class is to provide for management activities which require major modifications of the existing character of the landscape. The level of change to the characteristic landscape can be high. These management activities may dominate the view and be the major focus of viewer attention. However, every attempt should be made to minimize the impact of these activities through careful location, minimal disturbance, and repeating the basic elements.

The BLM currently manages the ISDRA according to the Multiple-Use Classes in the California Desert Conservation Area Plan. In the California Desert Conservation Area Plan, the Imperial Sand Dunes are identified as Multiple Use Class I, as well as Multiple Use Class C (North Algodones Dunes Wilderness Area). The VRM Classes that are associated with these Multiple-Use Classes are listed below:

Class I Intensive Use - VRM Class IV  
 Class M Moderate Use - VRM Class III  
 Class L Limited Use - VRM Class II  
 Class C Controlled Use - VRM Class I

## 2.0 Public Involvement

### A. Notices

BLM published a Notice of Intent to Prepare a Resource Management Plan for the Imperial Sand Dune Recreation Area, California and an associated Environmental Impact Statement in the Federal Register on March 18, 2008. The NOI states, “Public participation will be especially important at several points during the analysis and planning process. The scoping process (40 CFR 1501.7) for this analysis will include identification of issues and viable alternatives as well as identification and notification of interested groups, individuals and agencies to determine level of participation and obtain additional information concerning issues to be addressed in the RAMP/EIS.”

On April 4<sup>th</sup>, 2008, BLM published a news release announcing three public scoping meetings for the ISDRA RAMP planning effort. The dates and locations of each meeting are listed below:

<b>Date</b>	<b>Location</b>
Tuesday, April 22, 2008	<b>Handlery Hotel</b> 950 Hotel Circle North San Diego, CA 92108
Wednesday, April 23, 2008	<b>Mountain Preserve Reception and Conference Center</b> 1431 E. Dunlap Avenue Phoenix, AZ 85020
Thursday, April 24, 2008	<b>Imperial Irrigation District William R. Condit Meeting Room</b> 1285 Broadway El Centro, CA 92243

## B. Summary of Public Meetings

Approximately 30 members of the public, mainly off-highway vehicle users, discussed the future management of the Imperial Sand Dunes Recreation Area at the ISDRA scoping meetings in San Diego, CA, Phoenix, AZ and El Centro, CA.

BLM did not make formal presentations at the public meetings; attendees were free to explore displays and ask questions of the subject matter experts present.

BLM representation at each scoping meeting included: Vicki Wood – Field Manager, Thomas Zale – Associate Field Manager, Erin Dreyfuss – NEPA Coordinator, Michael Boxx – Law Enforcement Chief, Neil Hamada - Outdoor Recreation Planner, and Marisa Williams – Outdoor Recreation Planner for Vending. Stephen Razo of CDD also attended the meeting in Phoenix and Sandra McGinnis – CASO NEPA Coordinator, attended the meeting in San Diego.

During the meetings, attendees were encouraged to take extra information packages and comment forms and distribute them to interested individuals that were not able to attend the meetings.

## C. Additional Outreach

A number of potential partnerships exist that could help BLM broaden involvement in the planning process and widen acceptance and ownership in the future management of the ISDRA. Agreements with counties and communities will continue to be utilized and explored for activities and needs such as planning, transportation, law enforcement, emergency services and tourism. BLM will seek to incorporate management actions into the ISDRA RAMP/EIS that would benefit adjacent communities.

Prior to all public involvement opportunities, BLM uses letters, local media, on-line news releases to invite parties interested in the ISDRA RAMP/EIS to participate in the planning process.

## D. Cooperating Agencies

The El Centro Field Office anticipates inviting federal, state and local agencies to participate in the development of the ISDRA RAMP/EIS to provide information and/or technical assistance in evaluating public land resources in the planning area. These agencies include:

U.S. Border Patrol;  
U.S. Fish and Wildlife Service;  
California State Historic Preservation Office;  
Imperial County Sheriff's Office

Imperial County;  
U.S. Department of Defense;  
California Dept. of Fish & Game;

#### E. Collaboration with Tribes

BLM has not yet contacted federally recognized tribes to solicit information on their cultural issues for the Imperial Sand Dunes Recreation Area Management Plan, but BLM has contacted the Native American Heritage Commission in order to get a sacred lands search initiated. Once the sacred lands search is completed, BLM will send out consultation initiation letters.

#### F. Written Comments

BLM's official public scoping period began on March 18, 2008 with the publication of the NOI in the Federal Register. The majority of the public comments received were emailed and faxed. BLM received many written comments that reflect the interest of constituents and users who did not attend the public meetings.

### **3.0 Summary of Comments**

#### A. Agency Comments

BLM did not receive scoping comments from any agencies. Letters were received from the following clubs and organizations:

#### B. Comments from Clubs and Organizations

BLM received scoping comments from the following clubs and organizations:

- American Sand Association
- The Center For Biological Diversity
- California Off-Road Vehicle Association
- EcoLogic
- R and R Duners Club
- SandEaters
- San Diego Off Road Coalition
- United Desert Gateway

### C. Key Issues and Priorities

The following issues and concerns represent the key themes and priorities that emerged during the public scoping process. These key issues and priorities will be considered for analysis in the RAMP/EIS, in addition to preliminary issues identified by BLM personnel, cooperating agencies and user groups.

#### Key issues:

- Identification of areas that are open and closed to OHV recreation
- Re-evaluation of the need for an Adaptive Management Area
- Re-evaluation of the need for administrative closures to protect biological resources
- Management of the commercial vending program
- Management of the fee program Identification of allowable uses within each area of the ISDRA
- Identification of how BLM intends to carry out resource protection (microphyll woodlands, invertebrates, plants, cultural resources, etc.)

#### Concerns:

- Facilities management
- Law enforcement/Public health and safety
- Border issues
- Interpretive program management
- Possibility of concessions as a management tool
- The question of visitor capacity
- Solid waste/hazardous materials management

## **4.0 Planning Considerations**

### A. Issues Outside the Scope of the ISDRA RAMP

Certain issues raised during scoping will not be addressed in the ISDRA RAMP/EIS because they are either outside the scope of this planning process or are outside the authority of BLM.

#### *Establishing new Off-Highway Vehicle (OHV) Recreation Areas Outside of the ISDRA*

Many clubs and organizations requested that BLM consider establishing new areas for OHV recreation on other lands in the El Centro Field Office.

While the El Centro Field Office will consider making more areas available for off-highway recreation within the ISDRA, the scope of the RAMP/EIS will be limited to BLM-administered lands in the 150,000-acre ISDRA based on the following rationale:

The purpose and need for the ISDRA RAMP/EIS is mostly based on the designation of new critical habitat for Peirson's milk-vetch and the management of the ISDRA as it relates to this new designation. BLM acknowledges that there are concerns about the loss of public lands available for OHV use, but the ISDRA RAMP/EIS will analyze a range of alternatives, including the 'no action alternative', which would allow OHV use to continue in the ISDRA at the same levels prior to the 2003 RAMP Record of Decision.

Pursuant to the National Environmental Policy Act, 40 CFR 1506.1(c) says,

*"While work on a required program environmental impact statement is in progress and the action is not covered by an existing program statement, agencies shall not undertake in the interim any major Federal action covered by the program which may significantly affect the quality of the human environment unless such action:*

- (1) Is justified independently of the program;*
- (2) Is itself accompanied by an adequate environmental impact statement; and*
- (3) Will not prejudice the ultimate decision on the program. Interim action prejudices the ultimate decision on the program when it tends to determine subsequent development or limit alternatives" [emphasis added].*

In light of these considerations, BLM has determined that it is appropriate to maintain the scope of the current RAMP/EIS within the 150,000 acre ISDRA. Furthermore, any proposal developed on BLM lands outside of the planning area for this purpose would need to be accompanied by an adequate environmental impact statement, and the existing BLM resources and personnel allocated to the ISDRA RAMP/EIS are dedicated to addressing the purpose and need outlined in Chapter 1 of this Scoping Report.

## **5.0 Planning Criteria**

Planning criteria developed during public scoping will help guide the planning process. The preliminary planning criteria identified in the NOI published in the Federal Register are listed below:

- The plan will be completed in compliance with FLPMA, NEPA, and all other relevant Federal law, Executive orders, and management policies of the BLM;
- The planning process will include an EIS that will comply with NEPA standards;
- The plan will set forth a framework for managing recreational activities in order to maintain existing natural landscapes and critical habitat for the threatened PMV as well as provide for the enjoyment and safety of the visiting public.
- Where existing planning decisions are still valid, those decisions may remain unchanged and be incorporated into the new RMP (or amendment);

- The plans will recognize valid existing rights; and
- Native American Tribal consultations will be conducted in accordance with policy and Tribal concerns will be given due consideration. The planning process will include the consideration of any impacts on Indian trust assets.
- Consultation with the SHPO will be conducted throughout the plan.
- Consultation with USFWS will be conducted throughout the plan.

## **6.0 Future Steps in the Planning Process**

The ISDRA is presently managed under the 1987 ISDRA RAMP. Information and decisions from the existing RAMP will be reviewed and incorporated in this plan to the extent possible. Management will continue under the 1987 RAMP until the current planning effort results in an approved Record of Decision (ROD).

Although BLM welcomes input at any time during the planning process, the next official public comment period will be open upon publication of the ISDRA Draft RAMP and Draft EIS, which is anticipated to be released to the public in spring 2009. The draft document will contain a range of management alternatives for ISDRA public lands administered by the El Centro Field Office, including a “No Action” alternative and a “Preferred” alternative.

A Notice of Availability (NOA) will be published in the Federal Register followed by a 90-day public comment period. Copies of the ISDRA Draft RAMP and Draft EIS will be distributed to elected officials, regulatory agencies, and interested members of the public. The document will also be available on-line at the El Centro Field Office website: <http://www.blm.gov/ca/st/en/fo/elcentro.html>

Public meetings will be held during the 90-day comment period which will be announced through local news media at least 15 days prior to the event.

At the conclusion of the Draft RAMP and Draft EIS public comment period, the BLM will respond to comments and prepare a Proposed RAMP and Final EIS, which is anticipated to be released in January 2010. The availability of the Proposed RAMP and Final EIS will be announced in the Federal Register followed by a 30-day protest period.

At the conclusion of the protest period, the BLM will resolve valid protests and prepare a Record of Decision (ROD) which is anticipated to be released in spring 2010. A NOA for the ROD will be announced in the Federal Register.